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ELECTRONICALLY FILED
DOC #: <u>b22022</u>
DATE FILED: <u>6/16/22</u>

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June 17, 2022

**VIA ECF**

Judge Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Venecia Marte vs. Montefiore Medical Center,  
Case No. 22-cv-03491**

Dear Judge McMahon:

**MEMO ENDORSED**

We represent Defendant Montefiore Medical Center (“Montefiore”) in the above-referenced matter. We write to advise the Court that Montefiore will file a motion to dismiss Plaintiff’s Complaint with prejudice tomorrow. Accordingly, Montefiore respectfully requests that the Court: (i) adjourn the date for submission of the proposed case management plan pending resolution of the motion to dismiss, and (ii) adopt the proposed briefing schedule for the motion to dismiss set forth below. Plaintiff consents to these requests.

The Parties have conferred and request that the Court adopt the following briefing schedule for Defendant’s motion to dismiss:

Defendants’ Motion to Dismiss:	June 17, 2022
Plaintiff’s Opposition Papers:	July 18, 2022
Defendants’ Reply:	August 8, 2022

Thank you for your Honor’s time and consideration.

Respectfully submitted,

*/s/ Emma J. Diamond*

Emma J. Diamond

Hon. Barbara Jaffe  
January 18, 2022  
Page 2

cc: All Attorneys of Record (via ECF)